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12 *Co-Lead/Liaison Counsel for Plaintiffs*

13 UNITED STATES DISTRICT COURT

14 DISTRICT OF ARIZONA

15 In Re Bard IVC Filters Products
16 Liability Litigation

17 No. MD-15-02641-PHX-DGC

18 **MOTION TO FILE UNDER SEAL**

19 Plaintiffs' Co-Lead Counsel and the PEC respectfully move this Court, pursuant to
20 Federal Rule of Civil Procedure 26(c)(1)(G) and Local Civil Rule 5.6 for leave to file
21 under seal their Recommendation in accordance with this Court's sealed minute entry
22 (Doc. 21432).

23 RESPECTFULLY SUBMITTED this 6th day of February 2020.

24 BEUS GILBERT MCGRODER PLLC

25 By:s/ Mark S. O'Connor

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34 *Co-Lead/Liaison Counsel for Plaintiffs*

CERTIFICATE OF SERVICE

I hereby certify that on this 6th day of February 2020, I electronically transmitted the attached document to the Clerk's Office using the CM/ECF System for filing and transmittal of a Notice of Electronic Filing.

/s/ Jessica Gallentine